

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

Alonzo Austin,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	
Global Connection, Inc. of America, Sam)	3:07-CV-042-MEF
Abdallah, Rachelle Copeland and Global)	
Connection, Inc. of Alabama,)	
)	
Defendants.)	

ANSWER

COMES NOW, Defendants Global Connection, Inc. of America, Sam Abdallah, Rachelle Copeland and Global Connection, Inc. of Alabama and file this their Answer to Plaintiff's Complaint and show as follows:

1.

Defendants deny the allegations contained in Paragraph 1 of Plaintiff's Complaint.

2.

Defendants deny the allegations contained in Paragraph 2 of Plaintiff's Complaint.

3.

Defendants deny the allegations contained in Paragraph 3 of Plaintiff's Complaint.

4.

Defendants deny the allegations contained in Paragraph 4 of Plaintiff's Complaint.

5.

Defendants deny the allegations contained in Paragraph 5 of Plaintiff's Complaint.

6.

Defendants deny the allegations contained in Paragraph 6 of Plaintiff's Complaint.

7.

Defendants deny the allegations contained in Paragraph 7 of Plaintiff's Complaint.

8.

Defendants deny the allegations contained in Paragraph 8 of Plaintiff's Complaint.

9.

Defendants deny the allegations contained in Paragraph 9 of Plaintiff's Complaint.

10.

Defendants Sam Abdallah and Rachelle Copeland are not proper parties to this action as they have had no contractual relationship with the Plaintiff and are merely officers of the other named corporate Defendants. As such Defendants Sam Abdallah and Rachelle Copeland should be dismissed from this action.

11.

Defendants reserve the right to plead other and further affirmative defenses as discovery proceeds.

This 17th day of August, 2007.

MCKOON, THOMAS & MCKOON

/s/ Joshua R. McKoon

By: _____

Joshua R. McKoon
State Bar No. MCK057

925 Broad Street
P.O. Box 3220
Phenix City, Alabama 36868-3220
334.297.2300

CERTIFICATE OF SERVICE

Counsel for the Defendant has this day served the foregoing Response on the Plaintiff via First Class Mail at the following address:

Alonzo Austin
1321 Oliver Carus Road
Tuskegee, Alabama 36083

This 17th day of August, 2007.

/s/Joshua R. McKoon

Counsel for Defendant